

→ P4/12

Check Sheet

Company Name: *Container Corp.*

Permit Number:

PSD Number:

County:

Permit Engineer:

Others involved:

Application:

- Initial Application
- Incompleteness Letters
- Responses
- Final Application (if applicable)
- Waiver of Department Action
- Department Response

Intent:

- Intent to Issue
- Notice to Public
- Technical Evaluation
- BACT Determination
- Unsigned Permit

Attachments:

-
-
-
- Correspondence with:
 - EPA
 - Park Services
 - County
 - Other
- Proof of Publication
- Petitions - (Related to extensions, hearings, etc.)

Final Determination:

- Final Determination
- Signed Permit
- BACT Determination

Post Permit Correspondence:

- Extensions
- Amendments/Modifications
- Response from EPA
- Response from County
- Response from Park Services.

F 938 762 600

RECEIPT FOR CERTIFIED MAIL

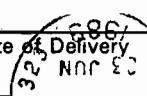
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

PS Form 3800, June 1985

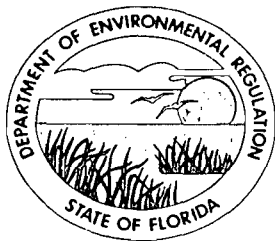
Sent to Mr. Paul Magnell, JSC/CCA	
Street and No. P.O. Box 2000	
P.O. State and ZIP Code Fernandina Beach, FL 32034	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Mailed: 6-22-89	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

<p>3. Article Addressed to: Mr. Paul A. Magnell Jefferson Smurfit Corp./CCA Mill Division P.O. Box 2000 Fernandina Beach, FL 32034</p>	<p>4. Article Number 938 762 600</p> <p>Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise</p> <p>Always obtain signature of addressee or agent and <u>DATE DELIVERED</u>.</p>
<p>5. Signature - Address X <i>J. Smurfit</i></p>	<p>8. Addressee's Address (ONLY if requested and fee paid)</p>
<p>6. Signature - Agent X</p>	
<p>7. Date of Delivery  6/26/89</p>	

11111



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

June 22, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul A. Magnell
General Manager
Jefferson Smurfit Corporation
and Container Corporation of America
Mill Division
N. 8th Street
Post Office Box 2000
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

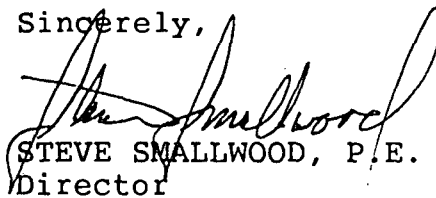
RE: Your Inquiry of Burning of Used Tires in the Wood-Fired
Boiler

The Department does not plan to modify your permit until the enforcement action regarding the previous burning of tires without a permit has been resolved, in accordance with Rule 17-4.070, F.A.C.

If, after the enforcement action has been resolved, you choose to revisit this situation, you must submit an application to amend your construction permit. An amended permit is required to perform a trial burn. This requires a 14 day notice for public comment. A hearing or public information meeting will be required due to the concern of the citizens in the area. If the trial burn is approved and is successful, then you may apply for a new construction permit to permanently utilize tires as a supplemental fuel.

If you need further information, please contact me.

Sincerely,



STEVE SMALLWOOD, P.E.
Director

Division of Air Resources
Management

SS/CF/s

cc: E. Frey, NW District
B. Stewart, NW District x2 (6-27-89)
C. Fancy, BAQM
C. Shaver, NPS
W. Aronson, U.S. EPA, Region IV } 6-22-89 ASL

P 274 010 419

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

* U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to Mr. Paul Magnell, JSC/CCA	
Street and No. North Main Street	
P.O., State and ZIP Code Fernandina Beach, FL 32034	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date Mailed: 4-4-89	

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4. Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. Paul Magnell General Manager JSC/CCA North Main Street Fernandina Beach, FL 32034	4. Article Number P 274 010 419 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature — Address X <i>[Signature]</i>	Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature — Agent X <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery <i>4-5-89</i>	

File Copy



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

April 4, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul Magnell
General Manager
JSC/CCA
North Main Street
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

Re: Request for Performance Test on the No. 5 Power Boiler
Firing TDF with Woodwaste

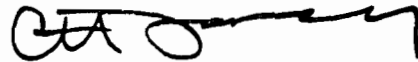
In the Department's pursuit of reasonable assurance, it was determined that performance tests at preselected percentages of each type of fuel (fuel oil with woodwaste and TDF with woodwaste) is a necessary step in determining the type of permit processing (amendment or modification) that will be required by the Department in order to authorize the continued use of TDF with woodwaste. Part of the authorization process includes the Public Notice of the Department's Intent to Issue, which is the next stage of the process to be performed.

In view of recent findings that TDF has already been fired in a source (No. 5 Power Boiler) at the mill, and that no source at the mill has ever received authorization through permitting to do so, the Bureau has been advised by legal counsel to temporarily cease further processing of the above referenced request. The Bureau will resume processing of the request upon advisement of legal counsel.

Mr. Paul Magnell
Page Two
April 4, 1989

If there are any questions, please call Mr. Bill Thomas at
(904)488-1344 or write to me at the above address.

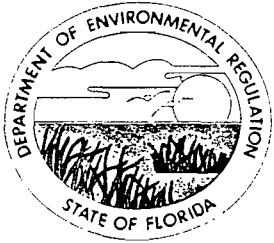
Sincerely,



C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/s

cc: J. Brown, CAMS, DER
B. Stewart, NE District
B. Hewitt, Esq., DER
C. Shaver, NPS
W. Aronson, EPA
B. Williams, JSC
R. Hagan, JSC/CCA
B. Fendig, NLT
M. Smallwood, Esq., Ruden Barnet
Reading File }
Bruce Mitchell } 4-4-89 AM



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

February 14, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul Magnelli
General Manager
JSC/CCA
North Main Street
Fernandina Beach, Florida 32034

Dear Mr. Magnelli:

Re: Amendment to the January 27, 1989 Letter from the Bureau of Air Quality Management on Performance Testing Using Tire Derived Fuel (TDF)

Based on available data and test results related to burning TDF, the presence of other pollutants/pollutant categories have been detected and are a concern of the Department. These pollutants/pollutant categories are: (1)PAH's (polycyclic aromatic hydrocarbons); (2)furans; and, (3)dioxins. Therefore, and along with the criteria pollutants (PM, NOx, SO₂, CO, and VOC) already identified in the above referenced letter of January 27, 1989, the Department will require testing for these pollutant/pollutant categories while burning fuel oil with woodwaste. The purpose is to establish the background levels of these pollutants/pollutant categories, if any, which will be compared to the test data acquired when firing TDF with woodwaste.

If there are any questions, please call Bruce Mitchell or me at (904)488-1344 or write to me at the above address.

Sincerely,

William A. Thomas, P.E.
Bureau of Air Quality
Management

WAT/BM/m

cc: B. Stewart, NE Dist.
W. Aronson, Region IV EPA
C. Shaver, NPS
B. Hewitt, Esq., DER

B. Williams, JSC
R. Hagan, JSC/CCA

2-13-89

~~CLC~~
FYI. Return to
Patty for filing
Hewitt
for.

Bob Williams
Jefferson Saurbit Corporation
1915 Wigmore Street
Jacksonville, FL 32201

Ben Fendig
Nassau Land & Trading Co., Inc.
P.O. Box 1859
Fernandina Beach, FL 32034

Mary Smallwood, Esq.
~~Ruden Barnett Mettos Key Smith Schuster & Russell, P.A.~~
101 North Monroe
Tallahassee, Florida 32301

Ready File
Bruce



P 274 007 577

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

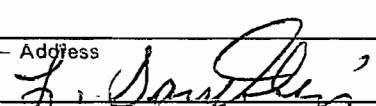
(See Reverse)

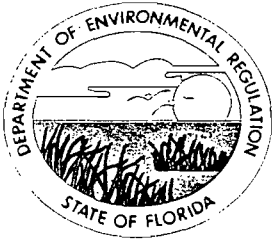
PS Form 3800, June 1985
 * U.S.G.P.O. 1985-480-794

Paul Magnell, Gen. Mgr.	
JSC/CCA	
Street and No. North Main Street	
P.O. State and ZIP Code Fernandina Beach, FL 32034	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date TDF issues assoc. with No. 5 Power Boiler mailed: 2/14/89	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge) 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Paul Magnell, Gen. Mgr. JSC/CCA North Main Street Fernandina Beach, Fl 32034	4. Article Number P 274 007 577 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and <u>DATE DELIVERED</u> .
5. Signature - Address X 	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery Feb 15, 1989	



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

February 14, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul Magnell
General Manager
JSC/CCA
North Main Street
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

Re: Amendment to the January 27, 1989 Letter from the Bureau of Air Quality Management on Performance Testing Using Tire Derived Fuel (TDF)

Based on available data and test results related to burning TDF, the presence of other pollutants/pollutant categories have been detected and are a concern of the Department. These pollutants/pollutant categories are: (1)PAH's (polycyclic aromatic hydrocarbons); (2)furans; and, (3)dioxins. Therefore, and along with the criteria pollutants (PM, NOx, SO₂, CO, and VOC) already identified in the above referenced letter of January 27, 1989, the Department will require testing for these pollutant/pollutant categories while burning fuel oil with woodwaste. The purpose is to establish the background levels of these pollutants/pollutant categories, if any, which will be compared to the test data acquired when firing TDF with woodwaste.

If there are any questions, please call Bruce Mitchell or me at (904)488-1344 or write to me at the above address.

Sincerely,

William A. Thomas, P.E.
Bureau of Air Quality
Management

WAT/BM/m

cc: B. Stewart, NE Dist.
W. Aronson, Region IV EPA
C. Shaver, NPS
B. Hewitt, Esq., DER

B. Williams, JSC
R. Hagan, JSC/CCA

Reading File
Bruce Mitchell } 2-14-89 RAM
CHF
John Brown

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION



Interoffice Memorandum

NORTHEAST DISTRICT, JACKSONVILLE

TO: Clair Fancy, DARM
FROM: W. P. Stewart *WPS*
DATE: February 2, 1989
SUBJECT: Container Corporation of America
Power Boiler #5
Test Burn - TDF

For Routing To Other Than The Addressee	
To: _____	Location: _____
To: _____	Location: _____
To: _____	Location: _____
From: _____	Date: _____

RECEIVED

FEB 3 1989

DER-BAQM

The purpose of this memo is to request the postponement of any testing of tire derived fuel (TDF) on the subject source.

We are presently preparing a Notice of Violation which, among other violations, attributes heavy fallout in the town of Fernandina Beach, December 20, 1988 through December 26, 1988, to this unit.

Container Corporation of America presently has a request to test burn shredded rubber tires (tire derived fuel - TDF) pending before CAPs. I recommend this test burn be delayed pending the resolution of this enforcement action based on the provisions of 17-4.070(5). While this provision speaks specifically to a permit and not a test, it would seem to me the intent is the same. In this case, the intent is to prohibit a similar activity on the same piece of equipment presently under violation. As the matter now stands, I do not believe that Container Corp. can provide reasonable assurance that the operation of #5 Power Boiler will not "discharge, emit, or cause pollution in contravention of Department standards or rules."

If you have any questions please let me know.

WPS:vk

cc: Ernie Frey

CHF 2-3-89 RAL

BT
Bruce Mitchell } rec'd FAX on 2-2-89 RAL

2-3-89

CHF

FYI. Laikala
return to RAL
Shaw
B...

P 274 007 566

RECEIPT FOR CERTIFIED MAIL

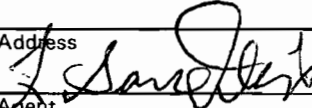
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

* U.S.G.P.O. 1985-480-794
PS Form 3800, June 1985

Paul Magnell, Gen. Mgr.	
JSC/CCA Street and No. North Main Street	
Fernandina Beach, FL 32034	
Postage	\$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$
Postmark or Date	
TDF issues assoc. with No. 5 PB mailed: 1/27/89	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

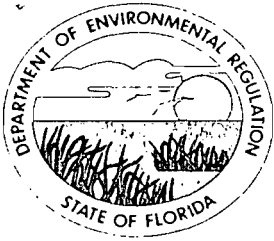
1. Show to whom delivered, date, and addressee's address. 2. Restricted Delivery (Extra charge)

3. Article Addressed to: Paul Magnell, Gen. Mgr. JSC/CCA North Main Street Fernandina Beach, FL 32034	4. Article Number P 274 007 566 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Address X 	Always obtain signature of addressee or agent and DATE DELIVERED.
6. Signature - Agent X	8. Addressee's Address (ONLY if requested and fee paid)
7. Date of Delivery Jan 28, 1989	

PS Form 3811, Mar. 1988

* U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

January 27, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul Magnell
General Manager
JSC/CCA
North Main Street
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

Re: Meeting of January 24, 1989, at the DER's Bureau of Air Quality Management (BAQM) on Performance Testing Using Tire Derived Fuel (TDF)

This letter is to confirm the results of the above referenced meeting held with your representatives (attendee list is attached). The following items were discussed and are only points raised thus far by the DER's BAQM and do not contain requests from the Region IV EPA and the National Park Service. Upon receipt of their concerns, we will forward them to you for information and a response, where one is requested:

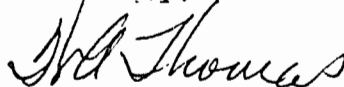
1. Realizing that performance tests for the existing operating permit are scheduled for around March, 1989, and for establishing a data base, the No. 5 Power Boiler is to be performance tested for PM, SO₂, NO_x, CO and NMHC on No. 6 fuel oil and woodwaste using EPA Reference Methods pursuant to 40 CFR 60, Appendix A, and F.A.C. Rule 17-2.700, except where a different test method has been approved by the Department prior to testing. Performance tests shall be conducted with the boiler operating at the same Btu heat input rates and fuel percentages that is proposed for the performance tests using TDF and woodwaste. Instead of using 5% increments, as previously proposed, it was proposed to performance test the boiler using TDF (and No. 6 fuel oil) at levels of 10, 20 and 30 percent of the total Btu heat input (therefore, three performance tests for each fuel combination).

Mr. Paul Magnell
Page Two
January 27, 1989

2. Visible emissions performance tests shall be conducted concurrently with each performance test conducted using both TDF and No. 6 fuel oil with woodwaste. Performance tests shall be conducted using EPA Reference Method 9 pursuant to 40 CFR 60, Appendix A, and F.A.C. Rule 17-2.700.
3. An ultimate analysis shall be performed on the particulate filters, the fly ash and the bottom ash/slag, after performance testing using TDF (and No. 6 fuel oil) with woodwaste and when the boiler operated at the highest Btu heat input percentage for each fuel combination (i.e. 30% for TDF (and No. 6 fuel oil); 70% for woodwaste).
4. It was suggested that a performance test be conducted at a location prior to the flue gas entering the ESP and at the highest Btu heat input percentage using TDF, with woodwaste, in order to establish the grain loading (gr/dscf) and volumetric flow rates (acfm and dscfm).
5. Prior to any performance testing using TDF with woodwaste, the Department's Intent will have to be placed on Public Notice in accordance with F.A.C. Rule 17-103.150 and Section 403.815, Florida Statutes.

If there are any questions, please call Bruce Mitchell or me at (904)488-1344 or write to me at the above address.

Sincerely,



William A. Thomas, P.E.
Bureau of Air Quality
Management

WAT/BM/s

enclosure

cc: B. Stewart, NE Dist.
W. Aronson, Region IV EPA
C. Shaver, NPS
B. Hewitt, Esq., DER
B. Williams, JSC
R. Hagan, JSC/CCA

Bruce
Ready File } 1-27-89
CHF
John Brown

Meeting @ BAQM

1-24-89

Attendees

Bill Thomas

FDER/DARM/BAQM/CAP

(904)488-1341

Bruce Mitchell

"

(904)488-1344

Roger Hagan

JSC/CCA

(904)(277-5808)

Ben Fendig

NLT

(904)261-7831

Mike Kennedy

(803)571-3055



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

January 27, 1989

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Paul Magnell
General Manager
JSC/CCA
North Main Street
Fernandina Beach, Florida 32034

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1. Realizing that performance tests for the existing operating permit are scheduled for around March, 1989, and for establishing a data base, the No. 5 Power Boiler is to be performance tested for PM, SO₂, NO_x, CO and NMHC on No. 6 fuel oil and woodwaste using EPA Reference Methods pursuant to 40 CFR 60, Appendix A, and F.A.C. Rule 17-2.700, except where a different test method has been approved by the Department prior to testing. Performance tests shall be conducted with the boiler operating at the same Btu heat input rates and fuel percentages that is proposed for the performance tests using TDF and woodwaste. Instead of using 5% increments, as previously proposed, it was proposed to performance test the boiler using TDF (and No. 6 fuel oil) at levels of 10, 20 and 30 percent of the total Btu heat input (therefore, three performance tests for each fuel combination).

BEST AVAILABLE COPY

Mr. Paul Magnell
Page Two
January 27, 1989

2. Visible emissions performance tests shall be conducted concurrently with each performance test conducted using both TDF and No. 6 fuel oil with woodwaste. Performance tests shall be conducted using EPA Reference Method 9 pursuant to 40 CFR 60, Appendix A, and F.A.C. Rule 17-2.700.
3. An ultimate analysis shall be performed on the particulate filters, the fly ash and the bottom ash/slag, after performance testing using TDF (and No. 6 fuel oil) with woodwaste and when the boiler operated at the highest Btu heat input percentage for each fuel combination (i.e. 30% for TDF (and No. 6 fuel oil); 70% for woodwaste).
4. It was suggested that a performance test be conducted at a location prior to the flue gas entering the ESP and at the highest Btu heat input percentage using TDF, with woodwaste, in order to establish the grain loading (gr/dscf) and volumetric flow rates (acfm and dscfm).
5. Prior to any performance testing using TDF with woodwaste, the Department's Intent will have to be placed on Public Notice in accordance with F.A.C. Rule 17-103.150 and Section 403.815, Florida Statutes.

If there are any questions, please call Bruce Mitchell or me at (904)488-1344 or write to me at the above address.

Sincerely,



William A. Thomas, P.E.
Bureau of Air Quality
Management

WAT/BM/s

enclosure

cc: B. Stewart, NE Dist.
W. Aronson, Region IV EPA
C. Shaver, NPS
B. Hewitt, Esq., DER
B. Williams, JSC
R. Hagan, JSC/CCA

1-27-89
~~1/29~~
FYI. return to
Patty for Jilij.
Blanks
Burr

Meeting @ BAQM

1-24-89

Attendees

Bill Thomas

FDER/DARM/BAQM/CAP

(904) 482-1344

Bruce Mitchell

"

(904) 482-1344

Roger Hagan

JSC/CCA

(904) (277-5808)

Ben Fending

NLT

(904) 261-7831

Mike Kennedy

(803) 571-3050

P 274 007 557

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

U.S.G.P.O. 1985-480-794

PS Form 3800, June 1985

Sent to Roger Hagan	
JSC/CCA	
North 8th Street	
P.O. Box 2000	
Fernandina Beach, FL 32034	
Postage	S
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	S
Postmark or Date Test Burn of TDF in No. 5 PB mailed: 1/20/89	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check boxes for additional service(s) requested.

1. Show to whom delivered, date, and addressee's address. (Extra charge)
2. Restricted Delivery (Extra charge)

3. Article Addressed to: Roger Hagan JSC/CCA North 8th Street P.O. Box 2000 Fernandina Beach, FL 32034	4. Article Number P 274 007 557 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise
5. Signature - Address X <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery Jan 23, 1989	

PS Form 3811, Mar. 1988

U.S.G.P.O. 1988-212-865

DOMESTIC RETURN RECEIPT



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtman, Secretary

John Shearer, Assistant Secretary

January 20, 1989

CERTIFIED MAIL - Return Receipt Requested

Mr. Roger Hagan
JSC/CCA
North 8th Street
P. O. Box 2000
Fernandina Beach, Florida 32034

Dear Mr. Hagan:

Re: Request to Test Burn TDF in No. 5 Power Boiler
on January 23, 1989

This letter is to confirm our conversation today concerning the above referenced request, which will be postponed until the Department's and other agencies' concerns have been resolved. Hopefully, many of these concerns will be discussed and resolved in the scheduled meeting of January 24, 1989, here at the Bureau. My staff and I are looking forward to the meeting.

If there are any changes needed in the arrangements for the meeting, please give me a call at (904)488-1344.

Sincerely,

William A. Thomas, P.E.
Bureau of Air Quality
Management

RBM/bm

cc: Paul J. Magnell, JSC/CCA
C. H. Fancy, BAQM
E. E. Frey, NE Dist.
B. Stewart, NE Dist.

Reading File
Bruce Mitchell }
John Reynolds } 1-20-89 per.
Bill Thomas }
John Brown }

Dept. of Interior, Denver, Co.

FAX # (303) 969-2822

attn: Brian Mitchell (303) 969-2072

Region IV EPA, Atlanta, Ga.

FAX # (404) 347-~~4886~~⁴⁴⁴⁶

attn: Wayne Aronson

(404) 347-2864

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BL

DALE TWACHTMAN
SECRETARY

FAX TRANSMITTAL LETTER

TO:

NAME: Brian Mitchell

AGENCY: Dept. of Interior

TELEPHONE NUMBER: 303/969-2072

NUMBER OF PAGES (INCLUDING COVER SHEET): 4

FROM:

Name: Bruce Mitchell

AGENCY: FL DER

TRANSMITTAL ON A HITACHI HIFAX-35 PHONE NUMBER 904-488-6579

IF ANY OF THE PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY. Phone No. 904/488-1344

SENDERS NAME: Patty Adams

COMMENTS:

Sent 1-10-89

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32399-2400



BOB MARTINEZ
GOVERNOR
DALE TWACHTMANN
SECRETARY

FAX TRANSMITTAL LETTER

TO:

NAME: Wayne Aronson

AGENCY: EPA Region IV

TELEPHONE NUMBER: 404/347-2864

NUMBER OF PAGES (INCLUDING COVER SHEET): 4

FROM:

Name: Bruce Mitchell

AGENCY: FLA DER

TRANSMITTAL ON A HITACHI HIFAX-35 PHONE NUMBER 904-488-6579

IF ANY OF THE PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY. Phone No. 904/488-1344

SENDERS NAME: Patty Adams

COMMENTS:

Sent 1-10-89



JSC/CCA

JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

January 3, 1989

Mill Division
NORTH 8TH STREET
P.O. BOX 2000
FERNANDINA BEACH, FL 32034
TELEPHONE: 904/261-5551

RECEIVED

JAN 05 1989

DER-BAQM

Mr. Steve Smallwood
Florida Dept. of Environmental Regulation
Bureau of Air Quality Management
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Re: Requested Trial of Tire Derived Fuel (TDF)

Dear Mr. Smallwood:

The purpose of this letter is to request authorization to conduct a trial burn of tire derived fuel (TDF) in our No. 5 power boiler. Container Corporation of America at Fernandina Beach has researched this supplemental fuel and has found it to be successfully used in Oregon by a paper mill belonging to our sister company, Smurfit Newsprint Corporation, and by two paper mills in Georgia. We believe that the use of this supplemental fuel will allow us to reduce the use of higher sulfur No. 6 fuel oil, based upon a fuel analysis (see attached), and help to reduce the problem of scrap tires in Florida's landfills. Based upon the above reasons we propose to conduct a trial burn along the following guidelines:

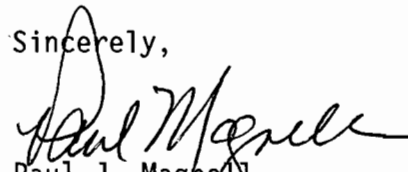
1. Conduct a trial burn of 5 to 7 days in length, beginning January 23, 1989.
2. Blend the TDF into the woodwaste stream beginning at 10 percent BTU addition and increasing it by 5 percent every 24 hours until 30 percent BTU addition is achieved. During the course of the trial No. 6 fuel oil will not be used in the boiler.
3. For the duration of the trial opacity will be monitored continuously. At the 15 percent BTU addition level and at the 30 percent BTU addition level a particulate check will be taken according to the requirements of Florida Administrative Code Rule 17-2.700(6) and (7) respectively.
4. If the above particulate check proves to be within guidelines established in our Permit/Certification Number A045-114418, dated March 17, 1986, we would propose to continue to use TDF, at a level not to exceed the highest level allowed under the particulate test, for a period of four months. The purposes of the extended duration of the test burn would be:

TDF Trial Request
January 3, 1989

- a) To determine if there are any operational problems unforeseen at this time which would disallow us from burning TDF in the long term.
 - b) To monitor the mill effluent stream for any build-up of zinc or zinc oxide as a result of long-term burning of TDF. Since our analysis has shown that zinc is the primary metal present in the tires, this would be monitored as an indication of any metals increase. This analysis would be run every two weeks during the four month trial period.
 - c) To provide additional particulate test data by testing the emissions after the second and fourth months of the test period.
5. Following the conclusion of the trial CCA would forward the data to the Department along with the appropriate permit modification form, if appropriate, within 45 days of the completion of the trial.

We would appreciate your prompt attention to this request. If we can be of any service in answering any questions about this TDF trial burn request, please don't hesitate to contact Roger Hagan at (904) 261-5551.

Sincerely,


Paul J. Magner
General Manager

PJM/js
Attachment

cc: E. E. Frey - FDER-Jax

copied: John Reynolds
CHF/BT

Roger



COMMERCIAL TESTING & ENGINEERING CO.

GENERAL OFFICES: 1919 SOUTH HIGHLAND AVE., SUITE 210-B, LOMBARD, ILLINOIS 60148 • (312) 953-9300

SINCE 1908

Member of the SGS Group (Société Générale de Surveillance)

November 29, 1988

PLEASE ADDRESS ALL CORRESPONDENCE TO:
16130 VAN DRUNEN RD., P.O. BOX 127
SOUTH HOLLAND, IL 60473
TELEPHONE: (312) 331-2900
TELEX: 285950 COMTECO SH UR
FAX: (312) 333-3060

▶ CONTAINER CORP. OF AMERICA
North 8th Street
Fernandina Beach, FL 32034
ATTN: Christine Hardy

Sample identification by
Container Corp. Of America

Kind of sample
reported to us Tire

Sample I.D.: Tire Sample

Sample taken at -----

Sample taken by Container Corp. Of America

Date sampled -----

Date received November 22, 1988

P.O. No. 042158-290

Analysis Report No. 71-66673

PROXIMATE ANALYSIS

	<u>As Received</u>	<u>Dry Basis</u>	
% Moisture	0.59	XXXXX	
% Ash	22.05	22.18	
% Volatile	59.24	59.59	
% Fixed Carbon	<u>18.12</u>	<u>18.23</u>	
	100.00	100.00	
Btu/lb	13895	13977	MAF 17961
% Sulfur	0.99	1.00	

Respectfully submitted,
COMMERCIAL TESTING & ENGINEERING CO.

Manager, South Holland Laboratory

OVER 40 BRANCH LABORATORIES STRATEGICALLY LOCATED IN PRINCIPAL COAL MINING AREAS,
TIDEWATER AND GREAT LAKES PORTS, AND RIVER LOADING FACILITIES

Original Copy Watermarked For Your Protection



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Bob Martinez, Governor

Dale Twachtmann, Secretary

John Shearer, Assistant Secretary

November 29, 1988

Mr. Paul J. Magnell
General Manager
Jefferson Smurfit Corporation
and Container Corp. of America
Post Office Box 2000
Fernandina Beach, Florida 32034

Dear Mr. Magnell:

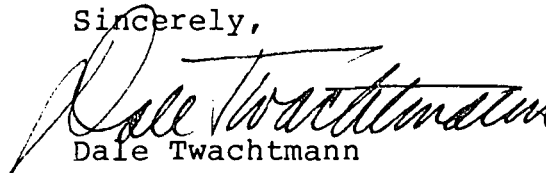
This is in response to your November 2 letter about burning used tires as an alternative to fuel oil in the No. 5 combination oil/bark fired power boiler at your facility.

The Bureau of Air Quality Management (BAQM) has been and is presently responsible for handling the new and modified permits for major facilities. Because your pulp and paper mill is classified as a major facility, previous air permitting activities has been handled by BAQM in Tallahassee, and this practice should also be continued for future permitting activities.

The Department is aware of the environmental problems associated with the dumping of used tires and will work with you to facilitate the permitting of this proposal.

Thank you for bringing this matter to my attention. Please contact Steve Smallwood at (904)488-1344 for assistance in filling your application to modify your existing permit.

Sincerely,



Dale Twachtmann
Secretary

DT/ks

cc: Ernest Frey, Northeast District
Steve Smallwood, DARM ✓

ROUTING AND TRANSMITTAL SLIP

ACTION NO

ACTION DUE DATE

1. TO: (NAME, OFFICE, LOCATION)

Initial

Date

2.

Initial

Date

3.

Initial

Date

4.

Initial

Date

REMARKS:

INFORMATION

Review & Return

Review & File

Initial & Forward

RECEIVED

NOV 14 1988

DER-BAQM

DISPOSITION

Review & Respond

Prepare Response

For My Signature

For Your Signature

Let's Discuss

Set Up Meeting

Investigate & Report

Initial & Forward

Distribute

Concurrence

For Processing

Initial & Return

FROM:

DATE 11-14-8

PHONE

D. Swackmann

Steve Smallwood: 10 Nov
I'm sympathetic as long as
it can meet the air standards.
Prepare a quick response to
them and see me!

[Signature]



JSC/CCA

RECEIVED

NOV 14 1988

JEFFERSON SMURFIT CORPORATION & CONTAINER CORPORATION OF AMERICA

DER-BAOM
Mill Division
NORTH 8TH STREET
P.O. BOX 2000
FERNANDINA BEACH, FL 32034
TELEPHONE: 904/261-5551

November 2, 1988

RECEIVED

NOV 10 1988

Mr. Dale Twachtman, Secretary
Florida Department of Environmental Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

Office of the Secretary

Dear Mr. Twachtman:

This letter is being directed to you at the suggestion of Mr. E. E. Frey, Deputy Assistant Secretary for the FDER Northeast District office. Its purpose is to inform you that the Container Corporation of America pulp and paper mill at Fernandina Beach intends to begin burning used tires as an alternative to fuel oil in our No. 5 combination oil/bark fired power boiler as soon as possible. There are several factors which lead us to believe not only that we can successfully do this, but that from both an environmental and economic standpoint it is imperative that the permit modification required to allow this alternate fuel be expedited to the fullest extent. These factors are discussed briefly below. If you concur with our assessment that this project be expedited, we would like to request, again at Mr. Frey's suggestion, that you assign the processing of the permit modification to the Northeast District office directly. This will greatly aid in facilitating the communications and information exchange needed for such a modification.

Container Corporation of America is an affiliate of Jefferson Smurfit Corporation, which also operates Smurfit Newsprint Co. mills in Newberg and Oregon City, Oregon. The Newberg, Oregon mill has successfully burned used tires in a bark fired boiler since 1986. Their experience, along with information from several other mills engaged in burning tires and from the technical literature, is more than enough to convince us that operationally we can successfully burn tires with little or no physical alteration of the existing boiler furnace or emissions control system. That information is available if you are interested in examining it yourself. It will be incorporated into the application for permit modification when it is formally submitted.

Briefly, we will be requesting a modification allowing us to burn up to 100 tons of used tires per day, although we expect to normally burn around 50 tons/day. Since the No. 5 power boiler normally burns around 1000 tons per day of bark, this will amount to only 5 to 10% of the fuel load on the boiler as used tires.

Mr. Dale Twachtman
November 2, 1988
Page 2

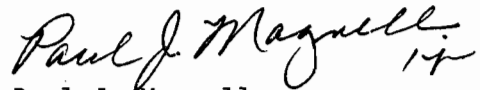
The environmental impact of this project will be very positive. We are all aware of the disposal problem created by the used tire dumps in all of Florida and in the Jacksonville area in particular. The public health problem caused by mosquitos breeding in the tires is also well known. We feel that burning the tires in our power boiler offers an environmentally acceptable means of disposing of this material. Our information shows that emissions from this boiler with the 5-10% fuel as tires should be no greater than at present and should certainly be well within the current permit limitations of this source. The electro-static precipitator on this source was installed in 1986, and is operating at 99.5%+ efficiency. Even so, we will propose in the application that we make some test burns of our own and thoroughly document any possible environmental effects of the project prior to proceeding with full-scale burning.

From an economic standpoint, used tires represent a very attractive alternative to fuel oil as a fuel. They are much higher in Btu content than bark and thus may allow us to increase the steam production of this boiler, which is currently limited by the amount of bark we can deliver to the furnace. Also, by virtue of their abundance and the difficulty in disposing of them otherwise, the tires can be purchased at very favorable pricing now. This makes them extremely attractive as a fuel under present economics.

From the above discussion, we hope that you agree that it is environmentally and economically desirable to expedite the processing of this permit modification. If so, we would again request that you assign processing of the modification directly to the Northeast District office to facilitate these proceedings. We will await your response advising us of your decision on this matter so that we will know where to direct the formal application for modification.

Thank you for your cooperation in this matter. If you have any questions, please feel free to call me at (904) 261-5551.

Sincerely,



Paul J. Magnell
General Manager

PJM/js

cc: E. E. Frey - FDER